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August 24, 2005

VIA FAX AND FIRST CLASS MAIL

David S. Nalven, Esq.
Hagens Berman Sobol Shapiro LLP
One Main Street
Cambridge, Massachusetts 02142

**Re: *In re Pharmaceutical Industry AWP Litigation*
*MDL No. 1456***

Dear David:

I am writing to confirm our conversations yesterday regarding David Cory's deposition. As we discussed, assuming that we have a common understanding of the documents that you seek to have Mr. Cory authenticate at deposition, GlaxoSmithKline would be willing to stipulate to the authenticity of those documents and, if appropriate, that they are business records kept in GSK's files, in exchange for the plaintiffs withdrawing the subpoena for Mr. Cory's deposition. This stipulation, which obviously would depend on our agreement as to the specific documents that you wish to have Mr. Cory authenticate, would enable the plaintiffs to obtain the information they seek from Mr. Cory without the need for his deposition.

As you know, Mr. Cory has indicated that he intends to invoke his Fifth Amendment privilege against self-incrimination during his deposition in this matter based on a target letter that he apparently received in an unrelated investigation involving his former employment with InterMune, Inc. As you also know from your conversations with Mr. Cory's attorney, and as you have discussed with both Mark Seltzer and me, the InterMune investigation does not involve Mr. Cory's former employment with GSK.

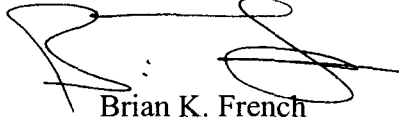
Although GSK's proposal would enable you to obtain the information that you seek from Mr. Cory without having to convene a deposition in which Mr. Cory has indicated that he will assert his Fifth Amendment rights based on an unrelated investigation, you informed me last night that you still intend to proceed with Mr. Cory's deposition, "at least for now," but that you might be willing to agree to our proposed stipulation in the future. In the interest of time and resources, we suggest that you reconsider your position and enter into the proposed stipulation at this time.

David S. Nalven
August 24, 2005
Page 2

Please do not hesitate to contact me if you would like to discuss this matter further.

Sincerely yours,

HOLLAND & KNIGHT LLP



Brian K. French